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August 15, 2016

VIA ECF & E-MAIL

Honorable Vernon S. Broderick
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: Timothy Holland v. Andre G. Bouchard, et al., No. 16-CV-5936-VSB (S.D.N.Y.)

Dear Judge Broderick:

Together with John Villa and William Burke of Williams & Connolly, LLP, counsel for whom *pro hac vice* applications will be filed, this firm represents Defendants Andre G. Bouchard, Chancellor of the Delaware Court of Chancery, and Robert B. Pincus, court-appointed custodian of TransPerfect Global, Inc. ("TransPerfect"), in the above-captioned action. In accordance with Individual Practice Rule 1.G, Defendants respectfully request additional time to respond to the Complaint, which was filed by plaintiff Timothy Holland on July 26, 2016. Chancellor Bouchard and Mr. Pincus's responses to the Complaint are currently due on August 23 and August 22, 2016, respectively. Defendants hereby request a twenty (20) day extension of time by which they must move to dismiss or otherwise respond to the Complaint, making their responses due on September 12, 2016.

Chancellor Bouchard and Mr. Pincus respectfully submit that good cause exists for this extension. The Complaint in this action arises from a series of court orders entered by Chancellor Bouchard in underlying litigation pending before the Delaware Court of Chancery, as well as Mr. Pincus's role as court-appointed custodian of TransPerfect in connection with that litigation. Having recently been retained, Defendants' counsel requests additional time to review the Complaint, analyze the record of the Court of Chancery proceedings on which Plaintiff bases his allegations, and prepare an appropriate motion to dismiss or other response to the Complaint. Allowing Defendants additional time to refine and present the arguments in their motions to dismiss will aid the Court in resolving the issues relevant to this case.

The Plaintiff has consented to the requested extension. This is Defendants' first request for an extension of time. We appreciate your Honor's attention to this matter.

Respectfully,

Jonathan D. Lupkin

cc: Andrew Goodman, Esq. (via ECF & email)